Shiloh S. Hernandez
Earthjustice
313 East Main Street
P.O. Box 4743
Bozeman, MT 59772-4743
(406) 586-9649
shernandez@earthjustice.org

Melissa A. Hornbein Western Environmental Law Center 103 Reeder's Alley Helena, Montana 59601 (406) 204-4861 hornbein@westernlaw.org 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5610 nathaniel.shoaff@sierraclub.org Attorney for Plaintiff Sierra Club

Sierra Club

Nathaniel Shoaff (pro hac vice)

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION

WESTERN ORGANIZATION OF RESOURCE COUNCILS et al.,

Plaintiffs,

VS.

UNITED STATES BUREAU OF LAND MANAGEMENT,

Defendant,

and

STATE OF WYOMING,

Intervenor-Defendant.

Case No. 4:20-cv-00076-BMM-JTJ

PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs Western

Organization of Resource Councils, Montana Environmental Information Center,

Northern Plains Resource Council, Powder River Basin Resource Council, Center

for Biological Diversity, WildEarth Guardians, and Sierra Club (together,

"Conservation Groups") hereby move for summary judgement, requesting this

Court to rule that "there is no genuine dispute as to any material fact and the

movant is entitled to judgment as a matter of law." Fed. R. Civ. P. 56(a).

Conservation Groups respectfully request that this Court declare that, as a matter of law, the Bureau of Land Management's approvals of the amended Resource Management Plans and Final Supplemental Environmental Impact Statements for the Buffalo Field Office and Miles City Field Office were arbitrary and capricious. Conservation Groups request this Court issue such further relief as set forth in the accompanying brief. L.R. 7.1(b)(1)(A).

Respectfully submitted October 29, 2021.

/s/ Shiloh Hernandez
Shiloh S. Hernandez
Earthjustice
313 East Main Street
P.O. Box 4743
Bozeman, MT 59772-4743
T: 406.586.9692 ext. 1929
shernandez@earthjustice.org

Melissa A. Hornbein Western Environmental Law Center

103 Reeder's Alley Helena, Montana 59601 (406) 204-4861 hornbein@westernlaw.org

Attorneys for Plaintiffs

Nathaniel Shoaff (pro hac vice) Sierra Club 2101 Webster Street, Suite 1300 Oakland, CA 94612 (415) 977-5610 nathaniel.shoaff@sierraclub.org

Attorney for Plaintiff Sierra Club